

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 21-173(1) (PJS/DTS)

UNITED STATES OF AMERICA,

v.

ANTON JOSEPH LAZZARO,  
a/k/a Tony Lazzaro,  
a/k/a Tony,

**MOTION TO ENLARGE TIME TO  
RESPOND TO DEFENDANT'S  
MOTIONS**

Defendant.

The United States of America, by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, and Melinda A. Williams, Assistant United States Attorney, hereby submits this motion to enlarge time to respond to defendant Lazzaro's motions for sanctions and for an evidentiary hearing in this case.

On June 20, 2022, defendant Lazzaro filed a Motion for Leave to Have the Court Consider a Motion for Sanctions (Dkt. No. 212), a Motion for Sanctions for Government Breach of Privileged Communications (Dkt. No. 213), and a Motion for Leave to Reinstate and Amend Motion to Dismiss for Selective/Vindictive Prosecution (Dkt. No. 214). On June 22, 2022, the government filed a Request to Respond to Defendant's Motion for Sanctions, asking the Court to allow the government to respond to the defendant's motions on July 21, 2022 (Dkt. No. 215).

That same day, the Court issued an order granting in part and denying in part the government's motion (Dkt. No. 216). The Court granted the government's request to respond to the motions and ordered that the response be due by July 8, 2022. *Id.*

The Court scheduled an evidentiary hearing for July 14, 2022. *Id.* To the extent the government was requesting additional time to respond to the objections to the R&R, the Court denied that request. *Id.*

Following the Court's order, the undersigned entered her appearance in this case. As has been discussed with defense counsel, the undersigned's appearance is only for the purpose of addressing the sanctions motions before the Court. Unfortunately, due to a previously scheduled vacation, the undersigned will be out of the jurisdiction and unavailable during the dates set by the Court.

The government, therefore, respectfully requests the Court's accommodation in the form of a short continuance of those dates. The government would respectfully request that its briefing, including any affidavits necessary to address the defendant's motion, be due on July 21, 2022, and that any evidentiary hearing take place during the weeks of July 25 or August 1, at a time that works for the Court and defense counsel. The undersigned has spoken with defense counsel, who does not object to this request.

Dated: June 27, 2022

Respectfully Submitted,

ANDREW M. LUGER  
United States Attorney

*s/Melinda A. Williams*

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